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October 24, 2023

Application GRANTED. Plaintiffs shall file their motion for preliminary approval by December 8, 2023. No further extensions will be granted absent extraordinary circumstances.

**VIA ECF**

Dated: October 25, 2023  
New York, New York

LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Hon. Lorna G. Schofield  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *In re Romeo Power Inc. Securities Litigation*, Case No. 1:21-cv-03362-LGS  
Joint Status Letter and Request for Extension

Dear Judge Schofield:

We represent Court-appointed Lead Plaintiff Mike Castleberg and additional named plaintiffs Joshua Cante, Nathaniel Tapia, Artur Chimchirian, and Van Nguyen (collectively, "Plaintiffs") in the above-referenced action. We write with the consent of counsel for Defendants Lionel Selwood and Lauren Webb to update the Court on the Parties' efforts to document the class action settlement and for Plaintiffs to file their Motion for Preliminary Approval of Class Action Settlement ("Preliminary Approval Motion"). The deadline to file the Preliminary Approval Motion is currently Friday, October 27, 2023. ECF No. 181.

The Parties have been diligently working on the Stipulation of Settlement and several documents related thereto, including the Motion for Preliminary Approval and supporting memorandum, Preliminary Approval Order, Judgment, Long Notice, Summary Notice, Postcard Notice, Claim Form and Supplemental Agreement. However, given, *inter alia*, the need for input from multiple constituencies, the Parties do not believe they will be able to meet the October 27, 2023, deadline to file the Preliminary Approval Motion. See ECF No. 181.

Having met and conferred, the Parties believe that they will be able to finish documenting the settlement, and that Plaintiffs will file their Motion for Preliminary Approval, by December 8, 2023. Accordingly, the Parties respectfully request that the Court order Plaintiffs to file the Motion for Preliminary Approval by December 8, 2023. This is the Parties' first request for an extension.

October 24, 2023

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Respectfully submitted,

*/s/ Kara M. Wolke*

Kara M. Wolke

cc: All Counsel of Record (by ECF)